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Attorneys for Plaintiff and Intervenor-Defendant
Droplets, Inc.

**IN THE UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

DROPLETS, INC.,

 Plaintiff,

 v.

 YAHOO!, INC.,

 Defendant.

Case No. 12-cv-03733-JST

**DROPLETS, INC.'S ADMINISTRATIVE
 MOTION TO FILE UNDER SEAL ITS
 MOTION TO CLARIFY CLAIM
 CONSTRUCTION**

OATH, INC., et al.,

 Intervenor-Plaintiffs,

 v.

 DROPLETS, INC.,

 Intervenor-Defendant.

DROPLETS, INC.,

 Plaintiff,

 v.

 NORDSTROM, INC.,

 Defendant

Pursuant to Civil Local Rules 79-5 and 7-11 and this Court's Standing Order Governing Administrative Motions to File Materials Under Seal ("Standing Order"), Plaintiff Droplets, Inc. ("Droplets") requests an Order authorizing the sealing of certain portions of its Motion to Clarify Claim Construction. Droplets has reviewed and complied with the Standing Order and Civil Local Rule 79-5.

The materials that Droplets seeks to file under seal or redact are identified in the chart below.

Document	Materials to Be Filed Under Seal or Redacted	Entity Designating the Document as Confidential
Droplets, Inc.'s Motion to Clarify Claim Construction	Passages containing or describing highly confidential business information of Yahoo!, Inc.	Information in this document has been designated "HIGHLY CONFIDENTIAL" by counsel for Yahoo! Inc. and notice is given under Civil L.R. 79-5(e)(1). Haley Decl., ¶3.
Exhibit 3 – Exhibit D of the Corrected Expert Report of Dr. Douglas Schmidt ("Schmidt Report") regarding Yahoo	Passages containing or describing highly confidential business information of Yahoo!, Inc, including highly confidential technical source code.	Information in this document has been designated "HIGHLY CONFIDENTIAL" by counsel for Yahoo! Inc. and notice is given under Civil L.R. 79-5(e)(1). Haley Decl., ¶4.

Under Civil Local Rule 79-5(a), an order to seal may issue "upon a request that establishes that the document, or portions thereof, is privileged or protectable as trade secret or otherwise entitled to protection under the law." Civil L.R. 79-5(a). A trial court has broad discretion to permit sealing of court documents for the protection of "a trade secret or other confidential research, development, or commercial information." Fed. R. Civ. P. 26(c)(1)(G). "When a party seeks to 'preserv[e] the secrecy of sealed discovery material attached to non-dispositive motions,' the party need only make 'a particularized showing under the good cause standard of Rule 26(c)' to justify sealing the materials." *Icon-IP Pty Ltd. v. Specialized Bicycle Components*, No. 12-cv-03844-JST, 2015 WL

1 984121, at *1 (N.D. Cal. Mar. 4, 2015) (quoting *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d
 2 1172, 1179 (9th Cir. 2006)).

3 As described in the supporting Declaration of Aisha Mahmood Haley, there is good cause to
 4 file under seal or redact the Reply identified above. Namely, it contains confidential and sensitive
 5 business information, including highly confidential source code. *See Icon-IP Pty Ltd. v. Specialized*
 6 *Bicycle Components, Inc.*, No. 12-cv-03844-JST, 2015 WL 984121, at *3 (N.D. Cal. Mar. 4, 2015).

7 For the reasons above, Droplets respectfully requests that the Reply identified above be filed
 8 under seal or redacted.

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 10 Dated: May 17, 2021

/s/ Aisha Mahmood Haley
 Aisha Mahmood Haley

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